

June 28, 1985

TO: Coal File, Inspection and Enforcement Folder
FROM: David Lof, Mining Field Specialist DL
RE: Genwal Coal Company, Crandall Canyon Mine, ACT/015/032
Folder #7, Emery County, Utah

DATE: May 24 and 31, 1985
TIME: 10:45 a.m. - 2:15 p.m. and
2:00 - 3:00 p.m., respectively
WEATHER: Thundershowers
COMPANY OFFICIAL: Wanda Gent
STATE OFFICIAL: David Lof
ENFORCEMENT ACTION: None

Compliance With Permanent Performance Standards

UMC 771 et al Permits

The Division granted final approval of the operators mining and reclamation plan in a letter to the operator dated May 12, 1983. All permit information and approval letters requested during the inspection were available.

UMC 817.11 Signs and Markers

The operator's mine identification sign is properly posted along the Crandall Canyon Forest development road near Station 67 + 00.

The operator has buffer zone signs posted along the berm which separates the disturbed mine area from the downslopes to Crandall Creek.

The perimeter markers around the approved disturbed area need to be maintained. During a May 10, 1985 meeting with Mr. King, I reminded him of the need to install and maintain new perimeter markers prior to commencing the construction of the new surface facility site later this summer. I suggested to him that they use perimeter markers similar to the type used by Soldier Creek Coal Company. These are small white signs with red lettering which simply say, "Perimeter". These signs are attached to fence posts and there is no doubt as to their purpose when they are posted on the mine site. Where as the use of flagging and roof bolts as perimeter markers can often be confusing and require excessive maintenance.

Topsoil markers were in place on both of the topsoil stockpiles.

UMC 817.21-.23 Topsoil

Upper Topsoil Stockpile, NOV N85-4-12-3, #2 of 3

This violation was issued on April 9, 1985 for failure to adequately protect the upper topsoil stockpile.

UMC 817.52 Surface and Groundwater Monitoring

Spring and Seep Inventory, NOV N85-4-7-2, #1 of 2

This violation was issued on March 14, 1985 for the operators failure to comply with Stipulation 817.52 Groundwater-(2)-DWH. The remedial action required that the operator respond to an August 17, 1984 letter from the Division requesting additional spring and seep inventory information by June 12, 1985.

Surface Water Monitoring, NOV N85-4-6-1

This violation was issued on March 6, 1985 for failure to conduct surface water monitoring in accordance with the approved monitoring program. The operator had failed to take a surface water sample in November and also failed to take field measurements of pH, electrical conductivity, dissolved oxygen and water temperature. The remedial action required that all samples be taken in accordance with the approved plan starting immediately.

The last water sample which was taken and available for inspection at the time of my February 22, 1985 complete inspection was a January 1985 sample, therefore, the next sample should have been in March 1985. However, at the time of this inspection I found that the next sample was not taken until April 19, 1985, and the operator still had not taken field measurements as required. Because the operator failed to comply with remedial actions required for the NOV, Cessation Order C85-4-7-1 is going to be issued for failure to abate the NOV. The Cessation Order will be terminated on the same day and the NOV will remain in effect until water samples for May and June 1985 can be reviewed to determine whether or not they are in compliance with their water monitoring program. If they are, the NOV will be terminated effective the date the sample was taken.

Andy King, of Genwal Coal Company, was informed of the impending Cessation Order and requirements for abatement of the NOV during a telephone conversation on June 6, 1985.

UMC 817.61 Use of Explosives

The operator had blasting records available for inspection. The last blasting which was recorded was done on September 6, 1983. The operators records show that no other blast have occurred since that date.

UMC 817.89 Disposal of Noncoal Wastes

Noncoal Waste, N85-4-12-3, #3 of 3

This violation was issued on April 9, 1985, for the operators failure to properly store and control noncoal waste materials within their permit area. The operator was required to: remove all soil material contaminated by oil and gas by July 9, 1985; pickup and dispose of all garbage, old timbers, metal and other noncoal wastes by April 25, 1985; submit complete plans to the Division for storage of all materials in a controlled manner by May 23, 1985; and place oil and gas absorbing material around and under the generator and oil/gas storage area to absorb all oil and gas spills, by May 8, 1985.

During my May 8, 1985 partial inspection, I found that the operator had picked up and disposed of almost all of the noncoal waste materials in the mine site and had spread some sawdust around the oil/gas storage area. The amount of sawdust which the operator had spread over the area was not adequate to cover the site so, I requested that the operator spread a minimum of two inches of sawdust over the entire area where oil and gas spills had previously occurred.

At the time of this inspection, I found that no additional sawdust had been spread over the area as requested. While I was on the mine site, on May 24, 1985, I spoke with Bud Gent and requested at that time that they place a minimum of two inches of sawdust over all of the area where oil and gas spills had occurred in the past.

The operator submitted plans for the relocation of the surface facilities which were to include plans for storage of materials on May 23, 1985. These plans were still under review at the the time of the inspection.

UMC 817.150-.176 Roads

Crandall Canyon Road, NOV N85-4-7-2, #2 of 2

This violation was issued on March 14, 1985 for the operators failure to construct and maintain the road within the permit area in accordance with the permit and the approved standards. The operator was to bring the roads up to design specification by May 13, 1985.

During a meeting I had with Andy King of Genwal Coal Company on May 10, 1985, we discussed the remedial actions for abatement of the violation. Mr. King said that they did not want to put down the eight inch gravel base on the road as required in the design specifications at this time, because the realignment work which was going to take place in response to NOV N85-4-5-2, #2 of 2. I told him that I understood and that there would not be a problem with extending the abatement deadline for applying the gravel base, but that they should have the sub-base properly graded and the culverts cleaned out by May 13, 1985.

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At the time of my inspection, I found that the grade and ditch of the Class II road to the portal pad had been maintained. However, the culvert at the base of the road still needed to be cleaned out. In addition, the culverts along the Class I road, from the sediment pond to the upper end of the mine yard, also needed to be cleaned. The ditch along the inside of the Class I road, from the cross culvert to the sediment pond down to the cross culvert by the upper topsoil stockpile, needed to be maintained.

I discussed this with Andy King on June 3, 1985 and he committed to having the maintenance completed by June 12, 1985. At that time we also discussed the berm on the outside of the road from the upper access point to the sediment pond embankment down to the topsoil stockpile. According to the operator's approved design for the road the road through this area is supposed to be crowned and there is not suppose to be a berm. Mr. King expressed concern that the removal of the berm, at least the section immediately adjacent to the sediment pond, may pose a safety problem and he wanted to contact a MSHA representative to find out whether or not they had jurisdiction over this particular area. I told him that if MSHA personnel requested that the berm be left that they should modify their plan but otherwise the berm should be removed and the road properly crowned so that runoff would be allowed to sheet off of the road.

UMC 817.181 Support Facilities and Utilities Installations

Mine Operation Facilities, NOV N85-4-5-2, #2 of 2

This violation was issued on February 21, 1985 for the operators failure to locate and construct their mine operations facilities in accordance with their approved permanent permit. The operator was required to submit plans for the relocation of the facilities and reclamation of the present facilities location by May 23, 1985.

The plans were submitted to the Division on May 23, 1985 as required and at the time of this inspection they were being reviewed by the Division technical staff.

re

cc: Charles Gent, Genwal
Bill Boley, Manti La-Sal National Forest
Donna Griffin, OSM
Joe Helfrich, DOGM
John Whitehead, DOGM

Statistics: See Co-op Mining Company, Trail Canyon Mine memo dated June 11, 1985 and Soldier Creek Coal Company, Soldier Canyon Mine memo dated June 18, 1985

0243Q-44-48

The operator was required to install a durable fence around the base of the upper topsoil stockpile and place loose straw at least 12 to 18 inches deep along the inside of this fence by May 21, 1985.

At the time of this inspection, I found that the fence had been installed along the base of the topsoil stockpile and straw placed along the inside of the fence. Therefore, the violation was terminated on June 6, 1985, effective May 23, 1985 the date the Division received notification of abatement from the operator.

UMC 817.41-.51 Hydrologic Balance

Portal Pad Runoff, NOV N85-4-12-3, #1 of 3

This violation was issued on April 9, 1985 for failure to mine in accordance with the approved mine plan and failure to pass all surface drainage from the portal pad area east of the conveyor, through the sediment pond. The operator was required to extend a temporary downspout from the existing culvert to the inlet of the cross culvert to the sediment pond immediately. In addition, they were required to submit plans to the Division by May 23, 1985 detailing how the runoff from the east end of the portal pad would be conveyed to the sediment pond in a controlled manner.

On May 23, 1985, the Division received plans from the operator regarding this NOV. The plans are presently being reviewed by the Division technical staff.

Undisturbed Diversion, NOV N85-4-16-1

This violation was issued on May 10, 1985 for failure to mine in accordance with an approved mine plan and failure to construct and maintain the undisturbed diversion above the disturbed area. The operator was required to either construct the diversion so that it would meet the approved design specifications or submit complete and adequate plans to the Division to modify the present design specifications by June 4, 1985.

On May 23, 1985, the Division received plans from the operator for the relocation of the operators surface facilities (NOV N85-4-5-2, #2 of 2) which included plans to change the design of the undisturbed runoff diversion. These plans were being reviewed by the Division Technical staff at the time of this inspection.

Sediment Pond

The operator had regraded the top of the sediment pond embankment to the inside to ensure that all runoff from the embankment would flow into the sediment pond, as requested during my May 10, 1985 meeting with Andy King.